

## REMARKS

### Claim Amendments

Claims 1-35 were originally pending in the application. Applicants have herein amended claims 1, 2, 5, and 23 for clarity and consistency to recite **two paired duplicate interface circuit cards and one and only one line card** respectively. No new matter is introduced by Applicants' claim amendments. Currently pending in the application are claims 1-35, as amended herein.

### Examiner's Objections

The Examiner has objected to the referenced application serial numbers as filed by Applicants. Applicants have herein amended the paragraph beginning on page 1, line 5 and on page 6, line 6 to correct the application serial numbers appropriately. It should be noted that the Examiner's suggested application serial number "091/703,604" is incorrect because of transposed digits, and should read instead "09/703,064, in agreement with Applicants' amendment.

Applicants respectfully traverse Examiner's objection c), on the grounds that the word "to" is correctly used as a preposition having as its object "much of the internet." Applicants accordingly respectfully request the Examiner to withdraw objections a), b), and c).

### 35 U.S.C. 102 Claim Rejections

The Examiner has rejected claims 1-7, 9, and 10 under 35 U.S.C. 102(b) as being anticipated by Oren et al. (U.S. Patent 5,844,887), hereinafter referred to as *Oren*. The Examiner has further rejected claims 1 and 2 under 35 U.S.C. 102(b) as being anticipated by Lamberg et al. (U.S. Patent 6,408,000), hereinafter referred to as *Lamberg*. The Examiner's 35 U.S.C. 102 rejection of a claim requires that the Examiner's cited reference teach each and every limitation of that claim. Applicants respectfully traverse the Examiner's 35 U.S.C. 102 rejections.

Claim 1 as amended herein recites among other things the limitation "**...wherein each of said facility interface circuit cards is connected to one and only one said line card.**" This is depicted, for example, in Applicants' Figure 1A, which shows each of facility interface circuit cards 11-0W, 11-0P connected to one and only one line card 13-0. This

limitation is not taught by *Oren*. To the contrary, Figure 5 of *Oren* depicts a **plurality** of facility interface circuit cards (PIM 50, 51) each connected via one of buses 90, 92, 94, and 96 to a **plurality** of line cards (JM 52) in a parallel column or row configuration. Nowhere else does *Oren* teach or suggest the above recited limitation of Applicants' claim 1 as amended herein. Therefore Applicants submit that claim 1 is not anticipated by *Oren*, and respectfully request that the Examiner withdraw his rejection of claim 1 as being anticipated by *Oren* under 35 U.S.C. 102(b).

The above limitation of claim 1 as amended is similarly not taught or suggested by *Lamberg*. To the contrary, *Lamberg* depicts in Figure 3 a plurality of facility interface circuit cards (MPR 20A,...,MPR 20J), each of which is connected to **two line cards** (for example, ROUT 21A and ROUT 21B). Thus *Lamberg* does not teach connection of each facility interface circuit card to **one and only one said line card**. Since *Lamberg* nowhere else teaches or suggests the above limitation of claim 1 as amended, Applicants submit that claim 1 as amended is in condition for allowance and respectfully request the Examiner to pass pending claim 1 to issue.

Similarly, Applicants' claim 2 as amended herein recites, among other things, the limitation "...such that **one and only one said line card is connected to each of said paired redundant interface circuit cards.**" Applicants submit that claim 2 as amended is not anticipated by *Oren* or by *Lamberg* and is therefore allowable for the same reasons as claim 1, and respectfully request the Examiner to pass claim 2 to issue.

Claim 5 as amended herein recites, among other things, the limitation "...wherein said **paired duplicate interface circuit cards are each connected in parallel with one and only one said line card, such that one and only one said line card is connected to each of said paired duplicate interface circuit cards.**" As described above, this limitation is disclosed by Applicants in Figure 1A. For the same reasons discussed in connection with claims 1 and 2, this limitation is not taught or suggested by *Oren*. Applicants accordingly submit that claim 5 as amended is in condition for allowance, and respectfully request the Examiner to pass claim 5 to issue.

Claims 2-4, 6-7, and 9-10 depend either directly or indirectly from independent claim 1 or claim 5, and accordingly inherit all of the limitations of their respective independent base

claims. Since base claims 1 and 5, as amended herein, are allowable, Applicants submit that claims 2-4, 6-7, and 9-10 are likewise allowable for the same reasons, and respectfully request the Examiner to pass claims 2-4, 6-7, and 9-10 to issue.

### **35 U.S.C. 103 Rejections**

The Examiner's 35 U.S.C. 103 rejection of a claim requires that the Examiner's cited combination of references teach each and every limitation of that claim. Applicants respectfully traverse the Examiner's 35 U.S.C. 103 rejections.

#### **A. Rejection as unpatentable over *Oren*.**

The Examiner has rejected claims 8, 23, 24, 26-29, 34, and 35 under 35 U.S.C. 103(a) as being unpatentable over *Oren*.

Claim 23, as amended herein, recites among other things the limitation: **"delivering said duplicate data streams from said two paired duplicate interface circuit cards to one and only one line card separate from said two paired duplicate interface circuit cards."** This limitation is disclosed as stated above in Applicants' Figure 1A, but is not taught or suggested by *Oren*, for the same reasons discussed above in connection with claims 1, 2, and 5. Applicants therefore submit that claim 23 as amended is allowable and respectfully request the Examiner to pass claim 23 as amended to issue.

Claims 8, 24, 26-29, 34, and 35 depend either directly or indirectly from independent base claims 5 or 23, and accordingly inherit all of the limitations of their respective base claim. Applicants therefore submit that claims 8, 24, 26-29, 34, and 35 are allowable for the same reasons that claims 5 and 23 as amended herein are allowable, and respectfully request the Examiner to pass to issue claims 8, 24, 26-29, 34, and 35.

Regarding claim 8, Applicants note that the Examiner's rejection cites *Ramaswami* as a reference without explicitly stating the relevance or motivation of *Ramaswami* in combination with *Oren*. Accordingly, Applicants submit that the Examiner's rejection of claim 8 over the combination of *Oren* and *Ramaswami* is improper.

B. Combination of Oren and Ramaswami

The Examiner has rejected claims 11-22, 32, and 33 under 35 U.S.C. 103(a) as being unpatentable over *Oren* in view of Ramaswami et al. (U.S. Patent 6,597,826), hereinafter referred to as *Ramaswami*.

Claims 11-22, 32, and 33 depend either directly or indirectly from independent base claims 5 or 23, and accordingly inherit all of the limitations of their respective base claim. Applicants therefore submit that claims 11-22, 32, and 33 are allowable for the same reasons that claims 5 and 23 as amended herein are allowable, and respectfully request the Examiner to pass to issue claims 11-22, 32, and 33.

C. Combination of Oren and Bromley

The Examiner has rejected claims 25, 30, and 31 under 35 U.S.C. 103(a) as being unpatentable over *Oren* in view of Bromley et al. (U.S. Patent 6,658,021), hereinafter referred to as *Bromley*.

Claims 25, 30, and 31 depend either directly or indirectly from independent base claim 23, and accordingly inherit all of the limitations of their respective base claim. Applicants therefore submit that claims 25, 30, and 31 are allowable for the same reasons that claim 23 as amended herein is allowable, and respectfully request the Examiner to pass to issue claims 25, 30, and 31.

Conclusion

Currently pending in the application are claims 1-62, as amended herein. In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Application No.: 09/703,027

Docket No.: 59182/P012US/10021641

Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 06-2380, under Order No. 59182/P012US/10021641 from which the undersigned is authorized to draw.

Dated: April 12, 2004

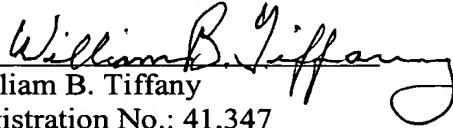
I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail, Airbill No EV482736444US, in an envelope addressed to: MS Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Dated: April 12, 2004

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Respectfully submitted,

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